

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE MERIT GROUP, LLC,

08 CV 3496 (JES)

Plaintiff,

-against-

**NOTICE OF PLAINTIFF'S
MOTION TO REMAND**

**SINT MAARTEN INTERNATIONAL
TELECOMMUNICATIONS SERVICES, NV
and THE TELEM GROUP, NV,**

Defendants.

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To: David B. Goldstein, Esq.
**RABINOWITZ, BOUDIN, STANDARD,
KRINSKY & LIEBERMAN, P.C.**
111 Broadway (11th Fl.)
New York, New York 10006

S I R S:

PLEASE TAKE NOTICE that, upon the annexed Affidavits of Harvey Bloch and Leonard N. Flamm, Esq., both sworn to May 7, 2008, and the Exhibits attached thereto, the undersigned attorneys for Plaintiff, the Law Offices of Leonard N. Flamm, will move this Court before the Honorable John E. Sprizzo, at the Courthouse located at 500 Pearl Street, Courtroom 14C, New York, New York 10007, on June 26, 2008, at 3:00 p.m., for an Order, pursuant to 28 USC 1447(c), remanding this action back to the Supreme Court of the State of New York, New York County, wherein this action was recently commenced and from where it was removed by Defendants, on the grounds, *inter alia*, that such removal was improper.

Dated: New York, New York
May 7, 2008

Respectfully Submitted,

**THE LAW OFFICES OF
LEONARD N. FLAMM**

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(212) 752-3380

By: /s/ Leonard N. Flamm
Leonard N. Flamm
(LF-9523)